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**Attorney for Defendant Robert Evans Mahler**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:16-CR-00105-AA-1**

**Plaintiff,**

**DEFENDANT'S TRIAL  
MEMORANDUM**

**v.**

**ROBERT EVANS MAHLER,**

**Defendant.**

**1. STATEMENT OF THE CASE**

Defendant, Robert Evans Mahler, is charged in an Indictment with one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g).

**2. WITNESSES**

Alexander Mahler

Kristine K. Yates

**3. EXHIBITS**

Exhibit 101A-J Photos of Kristine K. Yates

Exhibit 102- Statement of Account for Profession Services Provided to Kristine K. Yates from Garrett Hemann Robertson

**4. EXPECTED LENGTH OF TRIAL**

The defendant expects the trial to take 3 ½ days.

**5. PRETRIAL MOTIONS**

Presently, all of defendant's pretrial motions have been resolved by order of the Court.

Defendant may have other motions depending on issues that may arise prior to or during trial. Accordingly, defendant reserves the right to object to motions and/or requests filed by the government (especially to Verdict forms and Jury Instructions that are inconsistent with Appendi, Booker, and Crawford), and to bring new motions if appropriate.

**RESPECTFULLY SUBMITTED** THIS 24 day of August, 2018.

**WARREN & SUGARMAN**  
/s/ Ernest Warren, Jr.  
**Ernest Warren, Jr., OSB No. 891384**  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a certified true copy of DEFENDANT ROBERT MAHLER TRIAL MEMORANDUM the in the attached matter upon the parties listed below on by notice of electronic filing using the CM/ECF System:

**Gregory R. Nyhus**  
United States Attorney's Office  
1000 SW Third Avenue  
Suite 600  
Portland, OR 97204  
(503) 727-1015  
Fax: (503) 727-1117  
Email: greg.r.nyhus@usdoj.gov

and filed the original with the Court on the date listed below.

DATED this 24 day of August, 2018.

**WARREN & SUGARMAN**

/s/ Ernest Warren, Jr.  
**Ernest Warren, Jr. OSB No. 891384**  
Attorney for defendant